

BLUMENTHAL, NORDREHAUG &
BHOWMIK

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Attorneys for Defendant

Best Buy Stores, L.P.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KURT SWANSON and TAWNY
PEREZ, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

BEST BUY STORES, L.P., a Virginia
Limited Partnership; and DOES 1
through 50, inclusive,

Defendant.

Case No. SACV12-1377 AG (ANx)

**JOINT STIPULATION FOR
DISMISSAL PURSUANT TO
FRCP 41**

Complaint Filed: July 20, 2012

1 Plaintiffs KURT SWANSON and TAWNY PEREZ (“Plaintiffs”) and
2 Defendant BEST BUY STORES, L.P. (“Defendant”) (collectively referred to
3 herein as the “Parties”), by and through their counsel of record stipulate and agree
4 that:

5
6 1. This action be dismissed pursuant to Federal Rule of Civil Procedure
7 41(a)(1)(A)(ii) as follows:

- 8 a. All individual and PAGA claims brought by Plaintiffs on their own
9 behalf against Defendant are dismissed *with* prejudice, each side to
10 bear their own costs and attorneys’ fees;
11 b. All claims brought herein on behalf of others, including claims
12 brought against Defendant in a representative capacity on behalf of
13 others pursuant to PAGA, are dismissed without prejudice, each
14 side to bear their own costs and attorneys’ fees.
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16 IT IS HEREBY STIPULATED.

17
18 Dated: February 24, 2014

BLUMENTHAL, NORDREHAUG &
BHOWMIK

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20
21 By /s/ Aparajit Bhowmik
Norman B. Blumenthal
22 Kyle R. Nordrehaug
Aparajit Bhowmik
23 Piya Mukherjee
Attorneys for Plaintiffs
24 Kurt Swanson and Tawney Perez
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27
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1 Dated: February 24, 2014

MORGAN, LEWIS & BOCKIUS LLP

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3 By /s/ Barbara J. Miller

4 Barbara J. Miller
5 Christopher M. Robertson
6 Maria O. Gutierrez
7 Attorneys for Defendant
8 Best Buy Stores, L.P.
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